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8 Attorneys for Defendant  
9 North American Title Insurance Company

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 CHRISTIANA TRUST, A DIVISION OF  
13 WILMINGTON SAVINGS FUND  
14 SOCIETY, FSB, NOT IN ITS INDIVIDUAL  
15 CAPACITY BUT AS TRUSTEE OF ARLP  
16 TRUST 3,

17 Plaintiff,

18 vs.

19 NORTH AMERICAN TITLE INSURANCE  
20 COMPANY,

21 Defendant.

22 Case No.: 2:19-cv-01782-APG-BNW

23 **STIPULATION AND PROPOSED  
24 ORDER EXTENDING DEFENDANT'S  
25 TIME TO RESPOND TO THE  
26 COMPLAINT**

27 **(FIRST REQUEST)**

28 Plaintiff Christiana Trust, a Division of Wilmington Savings Fund Society, FSB, not in its  
Individual Capacity but as Trustee of ARLP Trust 3 (“Christiana Trust”) and defendant North  
American Title Insurance Company (“North American”), by and through their counsel of record,  
hereby stipulate as follows:

29 **WHEREAS**, Christiana Trust filed its complaint in this matter on October 14, 2019 (ECF  
30 No. 1);

31 **WHEREAS**, Christiana Trust served the complaint upon North American on January 6,  
32 2020;

33 **WHEREAS**, North American’s response to the complaint is currently due on January 27,  
34 2020;

1                   **WHEREAS**, North American's counsel was recently retained and requests additional time  
2 to respond to the complaint.

3                   **WHEREAS**, Christiana Trust does not oppose North American's request for an extension.

4                   **WHEREAS**, this is the first stipulation for an extension of North American's time to  
5 respond to the complaint.

6                   Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate  
7 and agree as follows:

- 8                   1. North American shall file its response to the complaint on or before February 11, 2020.
- 9                   2. North American intends to preserve its right and does not expressly waive any and all  
10                   defenses listed in Fed. R. Civ. P. 12(b).

11                   Dated this 27<sup>th</sup> day of January 2020

EARLY SULLIVAN WRIGHT  
GIZER & MCRAE LLP

13                   */s/--Sophia S. Lau*

14                   By: \_\_\_\_\_  
15                   Sophia S. Lau, Esq.  
16                   Nevada Bar No. 13365  
17                   8716 Spanish Ridge Avenue, Suite 105  
18                   Las Vegas, Nevada 89148

19                   Attorneys for Chicago Title Insurance Company

20                   Dated this 27<sup>th</sup> day of January 2020

21                   WRIGHT, FINLAY & ZAK, LLP

22                   */s/--Lindsay D. Robbins*

23                   By: \_\_\_\_\_  
24                   Lindsay D. Robbins, Esq.  
25                   Nevada Bar No. 13474  
26                   7785 W. Sahara Ave., Suite 200  
27                   Las Vegas, NV 89117

28                   Attorneys for Christiana Trust, a Division of  
29                   Wilmington Savings Fund Society, FSB, not in its  
30                   Individual Capacity but as Trustee of ARLP Trust 3

31                   **ORDER**

32                   **IT IS SO ORDERED:**

33                   Dated: 1/30/2020

34                   By: *Brenda Weksler*

35                   THE HON. BRENDA WEKSLER  
36                   UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of EARLY SULLIVAN WRIGHT GIZER & McRAE, LLP and that on January 27, 2020, the foregoing **STIPULATION AND PROPOSED ORDER EXTENDING DEFENDANT'S TIME TO RESPOND TO THE COMPLAINT** was served on all parties and counsel identified on the CM/ECF System via Electronic Notification, including on the following counsel:

Lindsay Robbins  
WRIGHT FINLAY & ZAK, LLP  
7785 W. SAHARA AVE, STE 200  
Las Vegas, NV 89117

/s/-D'Metria Bolden  
D'METRIA BOLDEN